



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
ENVIRONMENTAL RESPONSE BRANCH
Edison, New Jersey 08837

August 24, 1992

M/053/002

RECEIVED

SEP 17 1992

MEMORANDUM

SUBJECT: Leeds Silver Reclamation Site

FROM: Mark D. Sprenger *Mark Sprenger*
Environmental Response Branch

DIVISION OF
OIL GAS & MINING

TO: Pete Stevenson
Region VIII

Based upon our conversations regarding the Leeds Silver Reclamation Site, I have drawn up a general scope of work/outline for potential sampling at the site in support of the Removal Program.

As we had discussed, the general objective would be to determine if the material within the two catchment ponds, below the tailings pile, pose a substantial and imminent threat to the surrounding environment and particularly the wetland below the tailings pile. If this were to be the case, then, treatment of the ponds and the tailings on the leachpad may be appropriate.

I would anticipate that the effort would require two to three days of actual field work. Water and sediment samples would be collected from each of the catchment ponds and the wetland below the ponds. These samples would be analyzed for relevant chemical parameters and toxicity.

Screening, by XRF, of surface and subsurface wetland soils would be conducted to determine if historical releases from the catchment ponds occurred; thereby, documenting the potential for future release.

As noted in our site visit, several large willow trees exist in the upper and the lower wetland areas. However, the willows in the upper wetland, closer to the catchment ponds, appear to be in relatively poor condition. The growth rings of the willows from both areas will be evaluated for when these trees experience problems. The data generated would be used in an attempt to evaluate when (and potential relationship to the site and site activities exists) the apparent stress occurred. If additional woody species are present such that another tree can be evaluated, these trees will also be sampled.

During the site visit, a limited survey of the flora and fauna at the site was conducted. This survey would be expanded so that a more accurate evaluation of food chain pathways may be evaluated for potential threat. Additionally, this information may provide



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an indication as to whether or not the desert tortoise could utilize the area.

As stated above, I believe this effort would use approximately three field days, the validation and compilation of data, along with production of the report should take an additional two months (this is mostly due to the toxicity tests which require 14 days to conduct, although I think the animals will die a lot sooner than that). I believe the study could be conducted any time this fall or next spring; currently, I am unsure if the winter would be an appropriate time for the study.

If you have any questions, give me a call at 908-906-6826.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
FISH AND WILDLIFE ENHANCEMENT
UTAH STATE OFFICE
2078 ADMINISTRATION BUILDING
1745 WEST 1700 SOUTH
SALT LAKE CITY, UTAH 84104-5110



In Reply Refer To

(FWE)

June 11, 1992

M/053/002

UTAH DEPARTMENT OF
ENVIRONMENTAL QUALITY

JUN 16 1992

Brad T. Johnson
Acting CERCLA Branch Manager
Division of Environmental Response and Remediation
Utah Department of Environmental Quality
Salt Lake City, Utah 84114-4840

DIV. OF ENVIRONMENTAL
RESPONSE AND REMEDIATION

We have reviewed your letter requesting information on sensitive environments near the Leeds Silver Reclamation Site (EPA #UTD981550619). It appears that the following listed endangered and threatened species may occur in the area of influence of this action:

Listed

Virgin River Chub - Gila robusta seminuda
Woundfin Minnow - Plagopterus argentissimus
Desert Tortoise - Gopherus agassizii
Peregrine Falcon - Falco peregrinus

We would like to bring to your attention species which are candidates for official listing as threatened or endangered. While these species have no legal protection under the Endangered Species Act, we ask that you try to avoid them if they are found in the area. Candidate species which may occur in the Leeds Creek and Quail Creek riparian areas are:

Relict Leopard Frog - Rana onca
Virgin Thistle - Cirsium virginensis

The Federal agency permitting or otherwise authorizing your project should review your proposed action and determine if the action would affect any listed species or their critical habitat. If the determination is "may affect" for listed species, they must request in writing formal consultation from the Assistant Field Supervisor, U.S. Fish and Wildlife Service (Service) at the address given above. At that time, you should provide this office a copy of the biological assessment and any other relevant information that assisted you in reaching your conclusion.

Specific concerns that the Service has about this project and its potential impacts on threatened and endangered species are as follows:

The Virgin River chub and woundfin minnow occur in the Virgin River immediately below Quail Creek Reservoir. This area is within 15 miles downstream of the Leeds Silver Reclamation Site.

Low density desert tortoise habitat is located on the northwest side of Interstate 15 from near St. George to within about 1.5 miles of Leeds and also southeast of Leeds. Medium and high density use occurs in an

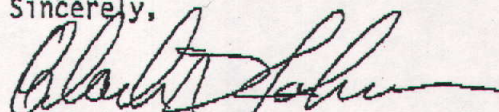
area 2.5 miles southwest of Leeds. A peregrine falcon pair nests about 2 miles northwest of the Leeds Silver Reclamation Site.

The Service can enter into formal Section 7 consultation only with another Federal agency. State, county, or any other governmental or private organizations can participate in the consultation process, help prepare information such as the biological assessment, participate in meetings, etc.

Your attention is also directed to Section 7(d) of the Endangered Species Act, as amended, which underscores the requirement that the Federal agency or the applicant shall not make any irreversible or irratrivable commitment of resources during the consultation period which, in effect, would deny the formulation or implementation of reasonable and prudent alternatives regarding their actions on any endangered or threatened species.

If you have questions or we can be of further assistance, please advise us. The Service representative who will provide you technical assistance is Bruce Waddell or Mark Stanger at (801) 524-5630.

Sincerely,



Clark D. Johnson
Assistant Field Supervisor